

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Mooresville Regional Office
County: Rowan
NC Facility ID: 8000163
Inspector's Name: Melinda Wolanin
Date of Last Inspection: 08/03/2015
Compliance Code: 3 / Compliance - inspection

<p style="text-align: center;">Facility Data</p> <p>Applicant (Facility's Name): Plant Rowan County</p> <p>Facility Address: Plant Rowan County 5755 NC 801 Highway Salisbury, NC 28147</p> <p>SIC: 4911 / Electric Services NAICS: 221112 / Fossil Fuel Electric Power Generation</p> <p>Facility Classification: Before: Title V After: Title V Fee Classification: Before: Title V After: Title V</p>	<p style="text-align: center;">Permit Applicability (this application only)</p> <p>SIP: NSPS: NESHAP: PSD: PSD Avoidance: NC Toxics: 112(r): Other: CAIR removal, CSAPR addition</p>
---	---

Contact Data			Application Data
Facility Contact	Authorized Contact	Technical Contact	
Shane Short Compliance Team Leader (704) 278-6657 5755 NC Highway 801 Salisbury, NC 28147	Ronnie Walston Plant Manager (704) 278-6601 5755 North Carolina 801 Highway Salisbury, NC 28147	Ronnie Walston Plant Manager (704) 278-6601 5755 North Carolina 801 Highway Salisbury, NC 28147	<p>Application Number: 8000163.16A Date Received: 10/24/2015 Application Type: Modification Application Schedule: TV-Reopen for Cause</p> <p style="text-align: center;">Existing Permit Data</p> <p>Existing Permit Number: 08758/T17 Existing Permit Issue Date: 04/24/2015 Existing Permit Expiration Date: 03/31/2019</p>

Total Actual emissions in TONS/YEAR:							
CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2014	9.20	123.26	17.52	182.00	59.93	7.08	3.84 [Formaldehyde]
2013	6.30	109.37	16.72	175.38	58.02	9.99	6.89 [Formaldehyde]
2012	7.21	153.64	20.61	218.41	71.60	12.45	8.58 [Formaldehyde]
2011	5.91	127.96	16.74	176.64	58.17	10.05	6.93 [Formaldehyde]
2010	5.30	116.05	14.17	151.22	49.46	8.61	5.93 [Formaldehyde]

<p>Review Engineer: Russell Braswell</p> <p>Review Engineer's Signature: _____ Date: _____</p>	<p style="text-align: center;">Comments / Recommendations:</p> <p>Issue 08758/T18 Permit Issue Date: Permit Expiration Date:</p>
---	--

1. Purpose of Application:

Plant Rowan County (PRC) currently operates under Air Quality Permit 08758T17. The existing permit contains references to the federal Clean Air Interstate Rule [CAIR]. This rule no longer applies and has been superseded by the Cross State Air Pollution Rule [CSAPR].

The DAQ has reopened this permit in order to remove references to CAIR and replace them with CSAPR.

2. Facility Description:

According to the most recent inspection report¹, "This facility is part of the retail division of Southern Power Company and generates electrical power for transmission to contract customers".

3. Application Chronology:

- August 25, 2015 Rahul Thaker sent an email to PRC informing them of the potential need for DAQ to reopen the permit in order to remove CAIR and add CSAPR.
- January 21, 2016 Application initiated by the NCDAQ.
- XXXXXX Initial draft
- XXXXXX Public / EPA Notice
- XXXXXX Permit issued.

4. Regulatory Review:

a. CAIR requirements

According to 40 CFR 52.35(f) and 52.36(e), CAIR no longer applies as of January 1, 2015. CAIR has been moved to Section 2.3. in the permit, which is for non-applicable regulations.

According to 15A NCAC 2D .2401(a), the purpose of the 2D .2400 rules was to implement CAIR. Given that CAIR no longer applies, the NC rules that implement CAIR also do not apply. Therefore, references to 2D .2400 rules have been moved to Section 2.3. in the permit.

b. CSAPR requirements

CSAPR (specifically, 40 CFR Part 97, Subparts AAAAA, BBBBB, and CCCCC) was originally scheduled to take effect on January 1, 2012. This rule was planned as a replacement for CAIR. However, CSAPR was challenged in court and initially vacated by the DC Circuit Court. Legal issues were finally resolved in April 2014, when the US Supreme Court reversed that decision. Because the regulation was delayed by court proceedings, the effective date of the rule was moved to January 1, 2015.

This rule and all requirements thereof are considered Federal-enforceable only. Compliance will be determined by the US EPA, not NC DAQ. A reference to this rule has been added to the permit.

¹ Melinda Wolanin, August 3, 2015

5. Facility Emissions Review

The transition from CAIR to CSAPR is not expected to change actual or potential emissions from this facility.

6. Public Notice/EPA and Affected State(s) Review

A notice of the DRAFT Title V Permit shall be made pursuant to 15A NCAC 2Q .0521. The notice will provide for a 30-day comment period, with an opportunity for a public hearing. Copies of the public notice shall be sent to persons on the Title V mailing list and EPA. Pursuant to 15A NCAC 2Q .0522, a copy of each permit application, each proposed permit and each final permit pursuant shall be provided to EPA.

Also pursuant to 2Q .0522, a notice of the DRAFT Title V Permit shall be provided to each affected State at or before the time notice provided to the public under 2Q .0521 above.

7. Recommendations

Issue permit 05543T23

Change List

Pages	Section	Description of Changes
Throughout	Throughout	<ul style="list-style-type: none">• Updated application/permit numbers• Updated dates• Removed references to CAIR.• Added references to CSAPR• Changed "2D" and "2Q" to "02D" and "02Q"• Fixed formatting errors.
	2.5.	<ul style="list-style-type: none">• Added section for non-applicable requirements.• Added CAIR and 2D .2400 to this section.
	3.	<ul style="list-style-type: none">• Updated General Conditions to v4.0.